PURPOSE

The purpose of this document is to define the various cost elements used in the development of the Indirect Cost Rate Plan (ICRP) to be used for the development of administrative rates by California local fire agencies for services provided to the Federal forest agencies and CAL FIRE under the California Fire Assistance Agreement (CFAA) and local cooperative fire agreements. Definitions and concepts from the Office of Management & Budget (OMB) Circular A-87 entitled "Cost Principles for State, Local and Indian Tribunal Governments" were used as an initial source.

Indirect Cost Rate Plan

An Indirect Cost Rate Plan (ICRP) is the mechanism used to develop an administrative/indirect cost rate. The ICRP process involves assigning characteristics to costs (i.e. allowable, unallowable) and classifying allowable costs into categories (i.e. direct, indirect) in order to formulate the cost elements needed to compute an indirect cost rate. When developing an ICRP, an organization should use costs from either the prior, prior year actual OR costs from the most recent actual year-end reports.

Indirect Cost Rate

The purpose of an Indirect Cost Rate (ICR) is to determine the ratio of allowable indirect costs to allowable direct costs.

Indirect Cost Rate = Allowable *Indirect* Costs / Allowable *Direct* Costs

Proper classification of costs as direct or indirect is important because of the impact on the ICR. For purposes of billing under the CFAA and local cooperative fire agreements, the following classifications have been agreed on and will be used by California local fire agencies opting to develop a specific ICR.

Used in the reimbursement process and expressed as a percentage, the ICR is multiplied by reimbursable direct incident costs to determine the reimbursable indirect amount.

EXPENSE DEFINITIONS

<u>Labor</u> – Labor costs include all salaries and benefits. Salaries are composed of the base salary, incentive pay and overtime pay. Benefits include the amount paid directly to the employee and/or the amounts paid or held on behalf of the employee.

Services and Supplies

Services and supplies generally include consumable items with a useful life of less than one year.

Minor Equipment

Minor equipment includes items with a useful life greater than one year and less than \$5,000 per unit cost.

Fixed Assets

Fixed assets include items with a cost per unit of \$5,000 or more.

COST DEFINITIONS

Allowable Costs

Costs included in the computation of the indirect cost rate. These costs will be categorized into either the direct or indirect cost pool.

Unallowable Costs

Costs excluded from the computation of the indirect cost rate. These costs are neither direct nor indirect as they are excluded from the calculation.

OMB circular A-87 Appendix B, provides principles in establishing the allowability or unallowability of certain items of costs whether **direct** or **indirect**. Additional information is provided in this package.

Direct Costs

Direct costs are usually those expenses that can be identified specifically with an agency's direct operations or those costs that can be identified specifically with a particular final cost objective. Direct cost categories include expenditures that have specific reimbursement rates such as operations personnel, prevention, aviation etc. The direct categories identified below are slightly different from the general definition in that they include activities for which reimbursement is not sought because the expense or activity is not related to the agreement under which the services are provided. Fleet maintenance is categorized as a direct cost because the costs associated with fleet are covered by the FEMA equipment rate and therefore are already being reimbursed through that methodology. Facility maintenance and Community Education costs have been categorized as direct costs because these costs are not expended for the purpose of the agreement.

Indirect Costs

Indirect costs (also referred to as Administrative costs) are usually those expenses that *cannot* be identified specifically with an agency's direct operations but rather are supporting activities. Under this particular methodology, some categories have specifically been classified as indirect so jurisdictions/agencies can be reimbursed for reasonable incident related expenditures not identified already as a direct reimbursement. *For example, minor equipment, PPE, and hose are used on an incident but are not directly reimbursed by the incident for the wear and tear and use of these items.* These items are used on a wildland fire and as a result, the useful life of that item is reduced. Including these items in the indirect cost pool allows for the recovery of a portion of these costs through the indirect rate.

Administrative Costs – If a person's regular non-emergency responsibility is an administrative function then the costs associated with that person would be placed in the indirect category. Conversely, if the person's regular responsibility is field/operations/line then the costs shall be included in the direct operations category. *Lobbyist expenses and city council, board of director or board of supervisors' costs are unallowable per A-87*.

RESOURCES

For state, local and Indian tribal governments additional information is available at:

Federal Cost Principle: OMB Circular A-87

http://www.whitehouse.gov/omb/circulars a087 2004#eb

COST CATEGORIES – DIRECT & INDIRECT

The table below provides department cost categories and their classification into Direct and Indirect categories. See below for additional information pertaining to select categories.

| Cost Categories * | Indirect | Direct | Unallowable |
|---|----------|--------|--|
| Emergency Medical Services | Х | Х | |
| General Administration | х | | Costs of Lobbyists, City Council Members, Board of Supervisors, Board of Director |
| Information Technology | Х | | |
| Logistics/Procurement/Supply/ Minor Fire Equipment | X | | |
| Public Information Office | X | | |
| Telecommunications | Х | | |
| Arson Investigation | | Х | |
| Community Education | | Х | |
| Facilities | | Х | |
| Fire Communication Center/Dispatch/Command and Control Center | | Х | |
| Fire Hazard Reduction Program | | х | |
| Fleet | | Х | Costs of Fixed Asset Purchases, Replacements and Depreciation. |
| Hazardous Materials Response Program | | Х | |
| Mapping | · | Х | |
| Operations | | Х | |
| Prevention | | Х | |
| Training | | Х | |
| Urban Search and Rescue | | Х | |

^{*} Cost categories include salaries and benefits, services and supplies and minor equipment.

Indirect Cost Categories

Emergency Medical Services – Indirect costs include supplies, minor equipment and administration of the program including certification, and EMT. *NOTE: EMT/paramedic training and salaries and benefits for paramedics are included in direct costs (see below).*

General Administration – Includes costs of general administration staff, fiscal functions, cost allocation or central city/county administrative costs (legal counsel, human resources, auditor/finance, city manager/CEO/CAO); public records, analyses and general overhead costs that support the entire department. *NOTE: Costs for lobbyists, members of the city council, board of supervisors or a board of director are unallowable per OMB Circular A-87*.

Information Technology – Includes costs of computers, laptops, servers, hardware, software, programming, network administration, services and repairs, CAD support and other related expenditures.

Logistics/Procurement/Supply/Minor Fire Equipment— Indirect costs include purchasing and warehousing of all non-incident related supplies. This includes all supplies including, PPE (personal protective equipment), and minor equipment but excludes vehicle parts, oil and fuel. Incident related costs such as food, lodging and travel costs are either billed directly or included as direct costs.

Public Information Office – Includes expenditures related to the public information office.

Telecommunications – Includes costs of telephones, cell phones, pagers, radios, radio communications and telephone infrastructure, servicing and repair of equipment, telephone lines, radios towers and other related expenditures.

Direct Cost Categories

Arson Investigation – Includes arson investigation related costs.

Community Education * – Includes costs of education programs for the general public.

Emergency Medical Services – Direct costs include EMT/paramedic training and salaries and benefits for EMTs and paramedics. *NOTE: Costs for supplies, minor equipment and administration of program are included in indirect costs (see above).*

Facilities *– Includes all facility related costs for maintenance of department owned and leased fire stations and support buildings.

Fire Communication Center/Dispatch/ Command and Control Center – Includes costs of dispatching fire resources and all other related services.

Fire Hazard Reduction Program – Includes weed abatement costs, defensible space, vegetation management.

Fleet *- Includes costs of vehicle maintenance labor, contract, supplies and parts, minor equipment, fuel and other related expenditures. Depreciation and/or replacement costs are unallowable as these are fixed assets. *NOTE: Fleet maintenance is included in direct costs because these costs are covered by the FEMA rate and therefore are already being reimbursed through that methodology.*

Hazardous Materials Response Program – Includes costs of hazardous materials response unit and CUPA (Certified Unified Program Agency) expenditures.

Mapping – Includes costs of geographical information systems, response maps, street center lines for CAD and other related expenditures.

Operations – Includes all field costs including aviation, hand crews, vegetation management programs, urban search and rescue, dozer operations and other related expenditures.

Prevention – Includes costs of fire prevention activities, code compliance, plan review, inspections and other related expenditures.

Training – Includes all training costs for safety and civilian personnel and other related expenditures.

Urban Search and Rescue – Includes costs of urban search and rescue responses and training and other related expenditures.

* The direct category identified may include activities for which reimbursement is not sought because the expense or activity is not related to the agreement under which the services are provided.

INDIRECT COST RATE PLAN ALLOWABLE AND UNALLOWABLE PRINCIPLES CHART

OMB Circular A-87

Appendix B - Selected Items of Cost (allowability or unallowability)

Appendix B provides principles to be applied to establishing the allowability or unallowability of of certain items of cost. These principles apply whether a cost is treated as direct or indirect. A cost is allowable for Federal reimbursement only to the extent of benefits received by Federal awards and its conformance with the general policies and principles stated in Appendix A to this part. Use Appendix B narrative for further clarification.

| Selected Item of Cost | Allowable | Unallowable | Comment |
|-------------------------------------|-----------|-------------|---|
| Advertising and public relations | Х | Х | See A-87 appendix B for specific coverage |
| | | | See A-87 appendix B direct/indirect |
| 2. Advisory Councils | X | | conditions |
| 3. Alcoholic beverages | | Х | |
| 4. Audit costs and related services | X | | See A-87 appendix B for specific coverage |
| 5. Bad debts | | Х | |
| 6. Bonding costs | X | | See A-87 appendix B for specific coverage |
| 7. Communication costs | Х | | |
| 8. Compensation for personal | | | |
| services | X | Х | See A-87 appendix B for conditions |
| 9. Contingency provisions | | Х | |
| 10. Defense and prosecution of | | | |
| criminal and civil proceedings, and | | | |
| claims | | Х | |
| 11. Depreciation and use | | | |
| allowances | Х | Х | See A-87 appendix B for conditions |
| 12. Donations and contributions | | Х | |
| 13. Employee morale, health, and | | | |
| welfare costs | Х | | |
| 14. Entertainment | | Х | |
| 15. Equipment and other capital | | | |
| expenditures | | Х | See A-87 appendix B for exception |
| 16. Fines and penalties | | X | |
| 17. Fund raising and investment | | | |
| management costs | | Х | |
| 18. Gains and losses on disposition | | | |
| of depreciable property and other | | | |
| capital assets and substantial | | | |
| relocation of Federal programs | X | Х | See A-87 appendix B for specific coverage |
| | | | examples include City Councils, Board of |
| 19. General government expenses | | X | Supervisors |

INDIRECT COST RATE PLAN ALLOWABLE AND UNALLOWABLE PRINCIPLES CHART

| 20. Goods or services for personal use | | X | |
|--|-----------|-------------|--|
| Selected Item of Cost | Allowable | Unallowable | Comment |
| 21. Idle facilities and idle capacity | | Х | See A-87 appendix B for exception |
| 22. Insurance and indemnification | Х | | See A-87 appendix B for certain conditions |
| 23. Interest | | Х | See A-87 appendix B for certain conditions |
| 24. Lobbying | | Х | |
| 25. Maintenance, operations and repairs | X | | |
| 26. Materials and supplies costs | Х | | |
| 27. Meetings and conferences | Х | | |
| 28. Memberships, subscriptions and professional activity costs | Х | | Lobbying organizations are unallowable |
| 29. Patent costs | X | Х | See A-87appendix B for conditions |
| 30. Plant and homeland security costs | х | | |
| 31. Pre-award costs | Х | | |
| 32. Professional service costs | Х | | See A-87 appendix B for conditions |
| 33. Proposal costs | Х | | |
| 34. Publication and printing costs | Х | | |
| 35. Rearrangement and alteration costs | Х | | |
| 36. Reconversion costs | Х | | |
| 37. Rental costs of buildings and equipment | X | | See A-87 appendix B for certain conditions |
| 38. Royalties and other costs for the use of patents | Х | | See A-87 appendix B for certain conditions |
| 39. Selling and marketing | | Х | |
| 40. Taxes | Х | | See A-87 appendix B for exception |
| 41. Termination costs applicable to sponsored agreements | | | See A-87 appendix B for criteria |
| 42. Training costs | Х | | |
| 43. Travel costs | Х | | |
| 44. Federal Grant monies | | Х | Not listed in A-87Appendix B |